

# **Procedures for Accessing the Funds**

#### OIL

Overview: Procedures for Accessing the OSLTF. These procedures apply to OSCs (either Coast Guard or EPA) who are performing oil removal operations under the National Contingency Plan and require funding support from the OSLTF.

- I. The FOSC accesses CANAPS via the Internet and requests issuance of an FPN and a corresponding ceiling amount.
- II. CANAPS will confirm via email and issue all necessary notifications by priority message. The message format is generated by CANAPS and sent via CGMS.
- III. Authorized users of CANAPS can act as surrogates to request a ceiling ON BEHALF OF other authorized users when their access to CANAPS is disrupted. District OPCENs have this authority/capability for units within their AOR, including EPA Federal On-Scene Coordinators (FOSCs)/Regions. EPA Regions are also able to act as surrogates for their FOSCs when available. The NPFC has the ability to act as a surrogate for any authorized CG or EPA field user of CANAPS. NPFC can also issue numbers manually in the event CANAPS is completely unavailable.
- IV. All ceiling messages, POLREPS, or other messages related to the incident where the OSLTF has been accessed shall include the FOSC, NPFC, CG FINCEN, and cognizant MLC contracting branch as INFO addees, in addition to current reporting requirements.
- V. If no funding has been expended against an FPN for the removal, the FOSC can request cancellation of the FPN via CANAPS.
- VI. The OSC ensures that obligations from the OSLTF remain within the authorized ceiling, and if necessary, promptly obtains additional ceiling via CANAPS.



#### VII. FPN Construction.

- 1. FY98 and Prior: FPNs for FY98 and prior years, back to FY86, consists of six digits. The first two digits delineate the Coast Guard District. The third digit is the last digit of the fiscal year and the remaining three digits constitute the sequential case numbers issued by the respective district offices. Although the construct is very functional, in that it allows the user to obtain the district, year of the case, and sequential case number, an overlap of cases will occur in 1999 due to the fact that only one digit is used for the fiscal year of the case.
- **2. FY99 through 2001**: The FPN uses a smart numbering scheme, ensuring the ability of the user to identify the district, fiscal year, and sequential number of the case. To avoid overlapping of current cases, the FPN was changed to an alphanumeric value where the first character is a letter delineating the district, the second and third characters are the fiscal year, and characters four through six are the sequential number of each district's cases which can be alphanumeric if necessary.

A. The first character will be the first letter of each city that the respective district headquarters are located in with the exception of the Ninth District which will be the letter "G" (Great Lakes) as "C" is already taken for CERCLA cases and would result in duplications if utilized. If the case is not an oil removal effort, the first character will represent the type of business being conducted. The following is a detailed listing of all first digit codes for FPNs:

- B First District
- P Fifth District
- M Seventh District
- N Eighth District
- G Ninth District
- A Eleventh District
- S Thirteenth District
- H Fourteenth District

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- J Seventeenth District
- C CERCLA Cases
- 9 Claims

B. The second and third characters are the two last digits of the fiscal year the case was opened. This resolves problems regarding duplication of FPNs for over ninety-nine years.

C. The fourth, fifth and sixth characters will create a sequence number that starts numerically until reaching the one-thousandth case at which time it changes to alphanumeric. If all 36 possibilities were exhausted in each of the three placesettings it would take 46,656 cases in a single fiscal year to exhaust all FPN possibilities. Following are examples of how the new construct would work:

- The first case for the Eighth District in 1999: N99001
- The one-thousandth case for the Eight District in 1999: N99A01
- The eleven-hundredth case for the Eighth District in 1999: N99B01
- And so on . . .

# **3. CANAPS Generated FPNs/CPNs.** CANAPS automatically generates FPN's and CPN's. FPN construction is as follows

*USCG:* First character is based on the District Office of the FOSC as follows:

- B First District
- P Fifth District
- M Seventh District
- N Eighth District
- G Ninth District
- A Eleventh District
- S Thirteenth District
- H Fourteenth District
- J Seventeenth District
- C CERCLA Cases
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The next two characters indicate the fiscal year. The final three characters are sequential based on the FPN's issued in that district during the current fiscal year.

EPA: All EPA FPN's star with the letter "E" followed by the two digit fiscal year. The fourth character indicates the number of the EPA region with a "0" indicating EPA region 10. The last two characters are sequential based on the number of FPN's issued to that region in that fiscal year.

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## **Procedures for Accessing the Funds**

### HAZARDOUS SUBSTANCES /CERCLA

Overview: Procedures for Accessing the SUPERFUND/CERCLA. These procedures apply only to CG OSCs who are performing hazardous substance response operations under the National Contingency Plan and require funding support from SUPERFUND, also known as the CERCLA Fund.

- I. The CG OSC accesses CANAPS via the internet and request issuance of a CERCLA Project Number (CPN) and a corresponding ceiling amount. CANAPS prepares all record message traffic via CGMS and delivers it to the appropriate units.
- II. Initial CERCLA ceiling requests will not exceed \$250,000. NPFC receives CERCLA funding authority in limited amounts from EPA each year and all ceilings are drawn from it. Funding requests that are equal to or greater than \$250,000 must be supported by an Action Memorandum prepared by the OSC. See Subtab "Action Memo Guidance" for guidance on CERCLA Action Memorandums. If the nature of the emergency requires a higher initial ceiling, the NFPC will coordinate such requests with the CG OSC, CG District, COMDT (G-MOR), and the EPA on a case-by-case basis.
- III. All messages, POLREPS, or other messages related to the incident where CERCLA/ SUPERFUND has been accessed shall include the OSC, NPFC, CG FINCEN, cognizant Coast Guard District (m), and cognizant MLC contracting branch as INFO addees, in addition to current reporting requirements.
- IV. The OSC ensures that obligations from CERCLA remain within the authorized ceiling, and if necessary, promptly requests increased ceiling authorizations via CANAPS. The OSC shall request the increase sufficiently in advance to avoid exceeding the ceiling at any point during response activities.



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- V. Special OSC Requirements for CERCLA Incidents. The CG/EPA Memorandum of Understanding and its resulting funding agreement place special requirements on the OSC. If a response requires less than \$250,000 in funding, the OSC must document a finding of imminent and substantial endangerment. This finding may be included in the situation description section of POLREP One, and at a minimum must include:
- the hazardous substance(s), pollutant(s), or contaminant(s) involved;
- description of what is affected or threatened (people, animals, crops, drinking water, etc.
- a statement indicating that this situation presents an imminent and substantial threat to public health, welfare, or the environment;
- description of the response action necessary to neutralize the threat.

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